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OCT 30 2013

U. S. DISTRICT COURT
MID. DIST. TENN.

IN THE UNITED STATES DISTRICT COURT

FOR THE 22nd DISTRICT OF TENNESSEE
Columbia DIVISION

Jason Iyles Name

Prison Id. No. 00412184

Name

Prison Id. No. _____

Plaintiff(s)

v.

Enoch George Name

Maury County Medical Center Name

Defendant(s)

(List the names of all the plaintiffs
filing this lawsuit. Do not use "et
al." Attach additional sheets if
necessary.)

Civil Action No. 1-13cv 0135
(To be assigned by the Clerk's
office. Do not write in this space.)

Jury Trial ☐ Yes ☐ No

(List the names of all defendants
against whom you are filing this
lawsuit. Do not use "et al." Attach
additional sheets if necessary.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
FILED PURSUANT TO 42 U.S.C. § 1983

I. PREVIOUS LAWSUITS (The following information must be provided by each plaintiff.)

- A. Have you or any of the other plaintiffs in this lawsuit filed any other lawsuits in the United States District Court for the Middle District of Tennessee, or in any other federal or state court?

☐ Yes

☒ No

- B. If you checked the box marked "Yes" above, provide the following information:

1. Parties to the previous lawsuit:

Plaintiffs _____

Defendants _____

2. In what court did you file the previous lawsuit? _____

(If you filed the lawsuit in federal court, provide the name of the District. If you filed the lawsuit in state court, provide the name of the state and the county.)

3. What was the case number of the previous lawsuit? _____

4. What was the Judge's name to whom the case was assigned? _____

5. When did you file the previous lawsuit? _____ (Provide the year, if you do not know the exact date.)

6. What was the result of the previous lawsuit? For example, was the case dismissed, appealed, or still pending? _____

7. When was the previous lawsuit decided by the court? _____ (Provide the year, if you do not know the exact date.)

8. Did the circumstances of the prior lawsuit involve the same facts or circumstances that you are alleging in this lawsuit.

☐ Yes

☐ No

(If you have filed more than one prior lawsuit, list the additional lawsuit(s) on a separate sheet of paper, and provide the same information for the additional lawsuit(s).)

II. THE PLAINTIFF'S CURRENT PLACE OF CONFINEMENT (The following information must be provided by each plaintiff.)

A. What is the name and address of the prison or jail in which you are currently incarcerated? Mary County Jail 1300 Lawson White dr
Columbia, TN

B. Are the facts of your lawsuit related to your present confinement?

☒ Yes

☐ No

C. If you checked the box marked "No" in question II.B above, provide the name and address of the prison or jail to which the facts of this lawsuit pertain.

D. Do the facts of your lawsuit relate to your confinement in a Tennessee State Prison?

☐ Yes

☒ No

E. If you checked the box marked "Yes" in question II.D above, have you presented these facts to the prison authorities through the state grievance procedure?

☐ Yes ☐ No

F. If you checked the box marked "Yes" in question II.E above:

1. What steps did you take? _____

2. What was the response of prison authorities? _____

G. If you checked the box marked "No" in question II.E above, explain why not. _____

H. Do the facts of your lawsuit pertain to your confinement in a detention facility operated by city or county law enforcement agencies (for example, city or county jail, workhouse, etc.)?

☒ Yes ☐ No

I. If you checked the box marked "Yes" in question II.H above, have you presented these facts to the authorities who operate the detention facility?

☒ Yes ☐ No

J. If you checked the box marked "Yes" in question II.I above:

1. What steps did you take? Filled out medical Request forms
wrote grievances

2. What was the response of the authorities who run the detention facility? that
I was in the bone and joint protocol

L. If you checked the box marked "No" in question II.I above, explain why not. _____

Attach copies of all grievance related materials including, at a minimum, a copy of the grievance you filed on each issue raised in this complaint, the prison's or jail's response to that grievance, and the result of any appeal you took from an initial denial of your grievance.

III. PARTIES TO THIS LAWSUIT

A. Plaintiff(s) bringing this lawsuit:

1. Name of the first plaintiff: Jason Lyles

Prison Id. No. of the first plaintiff: 00412184

Address of the first plaintiff: 1300 Lawson White Dr
Columbia TN 38401

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

2. Name of second the plaintiff: _____

Prison Id. No. of the second plaintiff: _____

Address of the second plaintiff: _____

(Include the name of the institution and mailing address, including zip code.
If you change your address you must notify the Court immediately.)

If there are more than two plaintiffs, list their names, prison identification numbers, and addresses on a separate sheet of paper.

B. Defendant(s) against whom this lawsuit is being brought:

1. Name of the first defendant: Enoch George

Place of employment of the first defendant: Mauvey County Sheriff
Department

The first defendant's address: 1300 Lawson White Dr Columbia TN
38401

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

2. Name of the second defendant: Mauvey County Medical Center

Place of employment of the second defendant: _____

The second defendant's address: 1300 Lawson White Dr
Columbia TN 38401

Named in official capacity? ☒ Yes ☐ No

Named in individual capacity? ☒ Yes ☐ No

If there are more than two defendants against whom you are bringing this lawsuit, you must list on a separate sheet of paper the name of each additional defendant, their place of employment, their address, and the capacity in which you are suing them. If you do not provide the names of such additional defendants, they will not be included in your lawsuit. If you do not provide their proper name, place of employment, and address, the Clerk will be unable to serve them should process issue.

IV. STATEMENT OF FACTS

State the relevant facts of your case as briefly as possible. Include the dates when the incidents or events occurred, where they occurred, and how each defendant was involved. Be sure to include the names of other persons involved and the dates and places of their involvement.

If you set forth more than one claim, number each claim separately and set forth each claim in a separate paragraph. Attach additional sheets, if necessary. Use 8 1/2 in. x 11 in. paper. Write on one side only, and leave a 1 in. margin on all four sides.

#1

I Jason Lyles came to the Maury County Jail Aug 15, 2013 after Ten Days being in Here. I went to the Nurses station and talked with Floyd the nurse. I told Him Right off that I have a life time care on my Right shoulder threw the bone and joint clinic with my Doctor Jeffery Adams it's threw worker Comp I had surgery on my Right Rotator Cuff and the Cartilage around my shoulder. Did not Heal all the way and the Doctor believe that I have a slight care in my shoulder again and after being in jail a week 1/2 I filled out medical Request letting the nurse know that I'm in alot of pain from Doing alot of Different push ups and I'm filling my bones shift in my left and Right Shoulder all way up and Down my collar Bones I can't Sleep on my Right or left side cause it's painful and Both my arms go numb from my shoulders alway Down to my finger tips on Both arms and the nurses have and will not Respond to my needs it's Been over 2 months and still know Respond I'm Really Hurtin. Sept 12, 2013 I injured myself on the Reck yard playing Basketball my knee popped out of place and at the sometime I told the Nurses Here about my Right and left Shoulders I told them Back in august that I had torn ligaments in my knee But on Sept 12, 2013 my knee popped out of place the C.O and the nurse Floyd came on got me took me By the nurse station in a wheel chair I couldn't walk at all so they took me to the front of the jail and put me in a holding cell to wait on a transportation officer to take me to the bone and joint clinic I waited in the Holding cell 4 1/2 Hours from 8:00am till 12:45pm in so much pain The C.O up front in Booking Didn't even ask why I was in the Holding cell in a wheel chair I didn't make it to the Doctor till 11:00pm

V. RELIEF REQUESTED: Specify what relief you are requesting against each defendant.

- A. I would like at least 500,000 from medical center
 - B. I would like at least 500,000 from Enoch George
 - C. maury County Sheriff Department.
 - D. I would at least like a Reasonable amount
 - E. From both Enoch George and the Medical Center
 - F. I also would like this to go public To the
- I request a jury trial. ☐ Yes ☒ No

and when I finally made it to the Bone and joint Clinic they Done X-Rays and told me that they was going to make me an appointment to have a MRI Done and on that Tuesday Sept 17, 2013 I went to Maury Regional Hospital to have my MRI Done So I had that done and on Sept 24, 2013 I went Back to the Bone and joint Clinic to get my Result from my MRI and the Doctor ask me did I Have a old injury I told him yrs from legiments the doctor said yes cause my legiments in my left knee is Completely gone plus on both sides of my left knee I have tears and I have a dare in the back part of my knee were the Soft part is it has a dare in it to and pluse I have a torn ACL a torn MCL and all that happen from this Injury on the Reck yard The doctor told me to stay in a wheel chair they brought me Back to the jail and put me in a Observation Cell for 4 days I only got out for one hour to use the phone and take a Shower I had to do everything on my own I didn't Have any help I had to take a Shower in a worn Handicap Shower Standing on one leg it was very Hard I had to dress myself the best way I could cause I couldn't Bend my knee at all They would not give me any pain medicine at all they would not give me a Ice pack like

the Doctor said Do for me to apply Ice to my knee Daily as He sent on his prescriptions the Nurses the Do nothing the Doctor Order them to Do But give me I B prophen 800 and that didn't help at all for my pain they took me out of Observation after 4 days cause Someone was sick throwing up and they moved me to Medical Mar So they called it in a cell with another inmate after telling me I couldn't Be around no other inmates in a wheelchair I even went out on Beck with about 15 to 20 people after this was said to because I asked to go back to the North Side of the jail Because they had me locked Down for 23 Hours and only had one hour to use the phone and take a shower they was letting us out on Beck at 8:00 am and 9:00 am in the morning I couldn't talk to my wife and kids at that time of morning So I ask to go Back to the Northside to general population So I could talk to my wife and kids and let them know whats going on with me but they wouldn't let me because they Said I couldn't Be around anyone in a wheelchair But Im lock Down in Mar 23 and I coming out on Beck with about 15 or 20 other inmates and Im lock down Back there in Mar with all the violent criminals are the murderers the Robbers the Rapist

every kind of violent Criminal you can think of But I can't go back to the Northside of the jail where I was originally housed at with all these violent offenders in a open pod were I'm able to use the phone or use the Rest Room or Shower anytime I want and it has a handicap shower But the Nurses and the C.O.'s wouldn't let me come back to the Northside to my pod 618 instead I had to sit in Super max and lock Down like I done something wrong in cell 230 in the Nastiest conditions I every seen the air vent was so Rusty that the wall around it and under it was Rusting to all 4 walls was stained with what looks like pee mold Rust there was even a bigger collection someone had made going along the top of the wall above the top bunk and our toilet the cell next to us whenever they use the Rest Room there Boo Boo and pee comes up in our toilet So when we wake up in the mornings our toilet was full of Boo Boo and pee the cell stinks and the cell looks like it haven't been cleaned in years its the Same way in 618 the open pod were I'm originally housed there are 4 toilets one toilet has been claud up for over 2 months Black bugs are flying around every toilet

every toilets sucks every Rest Room area smells like pee and from all my complaints and filling out medical Request they will not Respond about my shoulders my knee the Doctor Said He is scared to Do surgery on my knee Right now cause He scared I'll have a stiff knee and that was on Sept 24, 2013 the last time I seen or talk to the Doctor He want me to Do exercises to strengthen my knee but ever since then my Bone in my knee shifts out of place more I can't put alot of pressure on my knee I'm still in pain and I've been writing the Nurses the had no Response I'm wearing a Brace on my knee. there's nothing holding my Bone in place cause everything is torn anyway I move it turn it my bone shifts out of place I've complained and complained to the nurses No Response about my shoulders and knee So I wanna file lawsuits about my medical issues and unsanitary living conditions the three showers in our pod the walls are molded stained just out right nasty we have to wear our flip flops in the showers cause the floors are so nasty inmates catching stuff it's not safe to be in this jail I've complained filled out medical Request trying to let the Nurses know that I'm in pain I even ask the C.O's to talk to the nurse

We inmates can never talk to the nurse or catch up with them because the Nurses are always outside smoking cigarettes or they are gone. By 3:30pm my shoulders are hurting me. Bad my knee is hurting me. Bad it's Bad to have to walk around with a knee brace with everything torn in your knee. No ligaments holding your bone in place my bone shifting out of place as I walk or move my leg anyway. The nurses and the C.O's locked me down for my knee and being in a wheel chair because they say I'm vulnerable to an attack if anyone was to try and fight me or jump me I can hurt my knee worse than what it is if that was to happen. Well I'm in a pool with about 50 or more people with my knee and shoulders being in the shape that they are in. Bad. I ask the nurse for an extra matt to sleep on because the matt they give us to sleep on are so thin it's like sleeping on metal itself or the concrete floor. A roll of tissue is thicker than the matts we sleep on. So I ask for an extra one so I can sleep better cause of my shoulders and my left knee. He told me No that I would have to go to medical max lock down to get an extra matt. Our living conditions are horrible. The food

they feed us is horrible the smallest pourshin of food you can ever see I've went Days and Days without Basic movements they feed us the Same things every Day our last meal is at 3:30 pm I have sickle cell trate my Iron stay low and my Body stay weak and the jail know this from the very first time I came to jail years ago I'm easily to get sick and the jail and the Nurses Here refuses to give you anything extra or anything More for any Condition you are in I hurt myself Here playing basket ball on the Reck yard because the jail wont let us play Basket Ball in our tennis Shoes we have to play in there flipflops So my Knee pops out of place Badly. I Jason Lyles will like to file a lawsuit on my medical Conditions my Unsainitary living Conditions my Health Care. Im a state inmate Belonging to T.D.O.C Being Held in Maury County Correction Facility slash Jail I Don't get No Conversary Nothing a state inmate is allowed. We have to get water out of the four Sinks that over 50 or more people wash they hands brush there teeth spitt Boo Boo and pee in we Have to Drink the Same warm water out of the Sinks Connected to those toilets that is filthy Reaks with pee smell stains mold on the walls Dried up blood

all kinds of stuff Dried up on the walls and sinks and toilets of all four bath Rooms all three Showers the Same way. The inmates that Been in and out of This Jail for years they leave there wash cloths towels underwears and this jail Maury County Sheriffs Department Enoch George washes and passes out all the old towels and wash cloths to us inmates to use on our Bodies and the towels and wash cloths are still a Dirty Brown Color and Stinks and you Can even Still See the Names of the Old inmates on the wash cloths and towels that they pass out to us on a daily Bases They take our property and tell us that there being thrown away for Hanging our towels and Rags on our Bunks and the Next Day We will see our own towels and cloths on the Uniform and towel Rack Being passed out to other inmates to use. They Don't test None of there inmates for any kind of Diseases STD's Nothing They Don't test for Aids Nothing just throw us all in Here. They Have Recently Been finding Snakes on the Women Side of the jail inside a womans bunk under a womans matt over Here on the Men Side they Have found more than two snakes in the mens processing area I would like for these matters to go public

and for a News investigating team to come in here
and show these matters to the world this jail
need to be shut down fore down This is something
to show the world the lives of inmates in the
maury County Sheriff Department I Jason Lyles
will write more and Report more Disturbing matters
We all need Someone to Help us these things
I tell the world are So very true please
Help me with this lawsuit please Thank you

Jason Lyles

p.s Thursday 10-24-2013 I went for a follow up
on my left knee and Dr. Petit of bone & Joint Clinic
told me that I have to have Sugery and I need sugery.
with these New injuries, to my left knee and my
ACL and everything else being torn He's scared if
He do the Sugery the Jail won't take me to physical
Theropy 2to3 days a week and if I set down here
with Sugery and don't Do physical therapy I will have
a stiff knee and if I don't have the Sugery He's scared
that I will do further damage to my knee or eventaully
end up with a stiff knee anyway I've informed
Lt. Debra about this Matter and No Response. Still
No Response about my shoulders I've filled out medical Request
Greivence forms everything I'm being denied my Rights.

I know that I have several different lawsuits
I need professional Help with these matters.
Both my Shoulders are torn everything in and around
my knee is torn. There nothing being done about
None of these matters. My first week and a half I
Lost over 11 pounds I've been Here since Aug 15, 2013
and still Losing weight I weighted a 161 pounds
when I came in Now I'm down to 150.2 Can
anyone Help me. Dr. Petit of bone & Joint told
me only thing He Can do for me is give me
Cortisone Injections in my left knee until the
Jail and the Medical Nurses Here Comes up with
a solution.

Thank you

Joann Lyles

VI. CERTIFICATION

I (we) certify under the penalty of perjury that the foregoing complaint is true to the best of my (our) information, knowledge and belief.

Signature: Jason Ryles Date: 10-19-2013

Prison Id. No. 00412184

Address: 1300 Lawson White Dr Columbia TN 38401

(Include the city, state and zip code.)

Signature: _____ Date: _____

Prison Id. No. _____

Address: _____

(Include the city, state and zip code.)

ALL PLAINTIFFS MUST SIGN AND DATE THE COMPLAINT, and provide the information listed above. If there are more than two plaintiffs, attach a separate sheet of paper with their signatures, dates, prison identification numbers, and addresses.

ALL PLAINTIFFS MUST COMPLETE, SIGN, AND DATE SEPARATE APPLICATIONS TO PROCEED IN FORMA PAUPERIS, if not paying the civil filing fee.

SUBMIT THE COMPLAINT, THE REQUIRED FILING FEE, OR APPLICATION TO PROCEED IN FORMA PAUPERIS, TOGETHER. Complaints received without the required filing fee or application to proceed *in forma pauperis* will be returned. Filing fees, or applications to proceed *in forma pauperis*, received without a complaint will be returned.